

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

YPF HOLDINGS, INC.,	§	
	§	
Plaintiff,	§	CAUSE NO. 4:14-cv-3695
v.	§	
	§	
KARLIN PACIFIC, L.L.C.	§	
	§	
Defendant.	§	

MOTION FOR SUMMARY JUDGMENT

Karlin Pacific moves for summary judgment on all claims asserted by YPF Holdings on the ground there is no evidence Karlin Pacific has failed to comply with all the requirements of the contract between the parties.

YPF's real dispute is with its parent company for non-payment, not with Karlin Pacific. YPF has conceded that Karlin Pacific performed the work required by the contract, and in a satisfactory manner. We have also satisfied the audit requirements of the contract by supplying all the required information about Karlin Pacific's subcontractor. There is no evidence to the contrary.

After a series of conferences with and orders from the Court, Karlin Pacific has gone above and beyond the audit requirements of the contract to provide supplemental information. We have provided information about bank transfers and

about transactions wholly unrelated to the YPF project. YPF has not disputed our compliance with the Court's orders.

Karlin Pacific respectfully asks that the Court grant summary judgment and dismiss this case with prejudice, with costs taxed against YPF.

Respectfully submitted,

FOGLER, BRAR, FORD, O'NEIL & GRAY LLP

/s/ Murray Fogler

Murray Fogler

Attorney in Charge

State Bar No. 07207300

S.D. Tex. Bar No. 2003

mfogler@fbfog.com

711 Louisiana Street, Suite 500

Houston, Texas 77002

Tel: 713.481.1010

Fax: 713.574.3224

OF COUNSEL:

FOGLER, BRAR, FORD, O'NEIL & GRAY LLP

Jas Brar

State Bar No. 24059483

S.D. Tex. Bar No. 892270

jbrar@fbfog.com

Michelle E. Gray

State Bar No. 24078586

S.D. Tex. Bar No. 2148676

mgray@fbfog.com

ATTORNEYS FOR DEFENDANT KARLIN PACIFIC, LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2015, a true and correct copy of Defendant Karlin Pacific, LLC's Motion for Summary Judgment has been served on all counsel of record by the Electronic Service Provider, if registered, otherwise by email and/or fax, as follows:

Christina E. Ponig
Brett D. Solberg
DLA PIPER, LLP (US)
1000 Louisiana St., Suite 2800
Houston, Texas 77002

/s/ Murray Fogler

MURRAY FOGLER